



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

May 14, 2012

Mr. Paul Bradford, Supervisor
Kootenai National Forest
31374 US Highway 2
Libby, Montana 59923-3022

Re: CEQ # 20120102, EPA Comments on Final
Supplemental EIS and Record of Decision for
Young Dodge Project

Dear Mr. Bradford:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Supplemental Environmental Impact Statement (FSEIS) and Record of Decision for the Kootenai National Forest's Young Dodge Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.


The FSEIS and ROD identifies Alternative 1 M with slight modification as the selected alternative. As stated in our earlier DSEIS comments, EPA supports Alternative 1M to reduce hazardous fuels and fire risk in wildland urban interface (WUI) areas near homes and structures where there is high fire risk, and to improve forest health and restore declining tree species such as Ponderosa pine and western larch. While we have some concerns that the majority of timber harvesting is to be carried out via more disturbing ground skidding methods with greater potential for erosion and sediment production, we are pleased that the FSEIS indicates that cumulative soil disturbance post-harvest would be less than that displayed in the DSEIS and that Regional soil standards would be met.

We fully support the proposed decommissioning of 12.25 miles of existing road and placement of 27 miles of roads in long-term storage, and maintenance on portions of 98 miles of roads in order to reduce road impacts to soil and water resources. We are also pleased that the proposed project includes no new road construction, although 0.4 miles of road will be reconstructed, and 8.85 miles of existing unauthorized road will be added to the National Forest Road System.

We understand that the MA 12 open road density standard is proposed to be exceeded due to the historic high use of Roads #303 and #7168. We continue to support closure of 1.19 miles of Road #303 and 0.17 miles of Road #7168, both of which are currently open yearlong, in order to meet the MA 12 open road density standard of 0.75 mi/mi², and thus, reduce fragmentation of wildlife habitat and risks to wildlife security.

We appreciate the opportunity to offer comments and participate in the NEPA process. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at potts.stephen@epa.gov. Thank you for your consideration.

Sincerely,


for Julie A. DalSoglio
Director
Montana Office

cc: Suzanne Bohan/Judy Roos, EPA 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena